

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN**

2018 FEB - 1, P 12:40

UNITED STATES OF AMERICA, STEPHEN C. DRIES
 CLERK

Plaintiff,)
-v-) Case No. 1:17-cv-01740-WCG
)
Gary L. Pansier and Joan R. Pansier,)
)
)
Defendants.)
)

MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT

Defendants, Gary Lee Pansier, and Joan R. Pansier, hereby respectfully request an extension of time of sixty (60) days to respond to Plaintiff's Complaint pursuant to Fed.R.Civ.P. 6(b).

As good cause for this extention, Defendants state as follows:

1. On December 13, 2017, Plaintiff filed in the above-docketed matter an undated Complaint to reduce tax assessments to judgment. *See* Docket Entry 1.
2. On December 14, 2017, Plaintiff filed an Amended Complaint in the above-docketed matter an undated Complaint to reduce tax assessments to judgment. *See* Docket Entry 2.
3. Under the Federal Rules of Civil Procedure, Defendants' response to the Complaint would be due on February 6, 2018. *See* Fed.R.Civ.P. 12(a)(3)(A).
4. The tax periods at issue in the Complaint go back four (4) to twenty-three (23) years, 1995 through 2014, and Defendants require additional time to locate and reconstruct the applicable tax records and documents for the purpose of responding to the Complaint. A

number of Freedom of Information (Privacy Act) Requests have also been filed to obtain records, and Defendants' are currently waiting for responses from the Internal Revenue Service Disclosure Officers.

5. The relief requested for filing the response is also necessary due to the fact that Joan Pansier is the primary care-giver for Gary Pansier who suffers from chronic systolic heart failure, coronary artery disease, ischemic cardiomyopathy and carcinoma of the liver and time to research and review the allegations in the Complaint is limited.

6. The Internal Revenue is presently levying 100% of Defendants' airline pension; consequently, Defendant's are experiencing a financial hardship and are without financial resources to obtain legal counsel to represent them or assist them in drafting a response to the Complaint.

7. No dates have been set for any hearings, and an extension of time will not prejudice the Plaintiff or result in undue delay to the administration of this case.

IN WITNESS WHEREOF, Defendants respectfully move with good cause for the Court to extend the time for responding to Plaintiffs' Complaint to April 9, 2018. The Defendants' have enclosed a copy of the PROPOSED ORDER for the Court's convenience.

Respectfully submitted this 30th Day of January, 2018.

By: 

Gary Lee Pansier, Defendant
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Crivitz, Wisconsin 54114
(715) 854-7971

By: 

Joan Renee Pansier, Defendant
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